



COUNTY OF LOS ANGELES DEPARTMENT OF HUMAN RESOURCES

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LISA M. GARRETT
DIRECTOR OF PERSONNEL

October 31, 2023

To: All Department Heads

From: Lisa M. Garrett
Director of Personnel

NEW PPG 818 – NEPOTISM AND PERSONAL RELATIONSHIPS

As a public agency, it has always been the County of Los Angeles' (County) policy to ensure that employment decisions are merit-based and free from any conflict of interest or favoritism. A key aspect of this effort is to ensure that employees do not have direct supervision, hiring power, or influence over relatives or individuals with whom they have close personal relationships. Accordingly, the Department of Human Resources (DHR) has now developed the new Countywide Policies, Procedures, and Guidelines (PPG) No. 818, *Nepotism and Personal Relationships*, to establish minimum standards for all County employees in this area.

This new policy formally states that employees cannot supervise or be placed in certain working arrangements with relatives and other specified personal relationships (e.g., spouse, roommate, romantic partner). Under PPG 818, departments may still authorize exceptions to this practice if it is determined that such a relationship does not present a conflict of interest or negatively impact the department's system of checks and balances. Such exceptions must be documented through a written approval and mitigation plan.

Additionally, all County employees are now required to provide written notice once they become aware of any current or pending working relationships that may violate this policy. **Departments are to provide all employees with a copy of the County's Nepotism and Personal Relationships policy at the time of hire and on an annual basis so that all members of the workforce understand their obligation to report such relationships.**

Please be aware that the limitations on supervisory relationships outlined in PPG 818 may impact pre-existing departmental policies relating to nepotism, personal relationships, or similar issues. Please review your department's applicable policies and make revisions as necessary to ensure compliance with this new Countywide *Nepotism and Personal Relationships* policy.

To Enrich Lives Through Effective and Caring Service

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The new *Nepotism and Personal Relationships* policy (Attachment I), and the accompanying *Frequently Asked Questions* document (Attachment II), have been attached for your review. The PPG and related materials can also be viewed online at <http://mylacounty.gov/county-policies> under the HR Policies and Manuals section.

Should you have questions, please contact me or David M. Morfin, Senior Human Resources Manager, at DMorfin@hr.lacounty.gov.

Attachments (2)

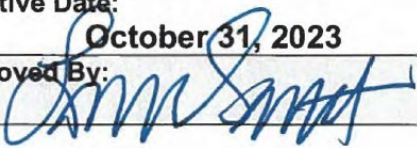
LMG:PAM:JAWT
DMM:LR

c: Chief Deputies
Administrative Deputies
Departmental Human Resources Managers

HRDS_PPGs\PPG 818\LMG to DHs -New PPG 818 Nepotism - 10-31-2023



**County of Los Angeles
Department of Human Resources
POLICIES, PROCEDURES, AND
GUIDELINES**

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	Approved By: 	

POLICY

It is the County's policy to ensure that workplace decisions are merit-based and free from any real or apparent conflict of interest, favoritism, or preferential treatment. Therefore, all County departments must make reasonable efforts to prevent nepotism and potential conflicts of interest by regulating the employment and assignment of relatives and certain personal relationships.

Employees shall not supervise or be placed in positions of interrelated trust with a relative and/or someone with whom they have a personal relationship as defined by this policy. At the time of hiring, promotion, reassignment, or when circumstances change that would require disclosure under this policy, employees must disclose in writing to their Departmental Human Resources Manager (DHRM) and/or designee all relationships prohibited by this policy. This extends to relationships with non-County staff members, such as contractors, temporary agency employees, Commissioners, or volunteers, where reporting or working arrangements may present a conflict of interest. Departments shall assess all relationships disclosed by employees to evaluate whether potential nepotism or conflicts of interest may occur and take action as necessary in accordance with this policy.

DEFINITIONS

Cohabitation is defined as a living arrangement where individuals regularly reside in the same household.

A **Conflict of Interest** refers to situations where professional judgment, decisions, or actions may be compromised due to a conflict between personal interests and official responsibilities.

Interrelated trust refers to positions with oversight, approval, or auditing relationships that help to ensure the integrity of the County's internal controls and personnel, fiscal, or programmatic operations.

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Nepotism is the practice of individuals with power or influence providing unfair advantage (personal, economic, or employment) to a relative or someone with whom the individual in power has a personal relationship.

Personal relationship is defined as a current relationship between persons as a result of cohabitation, romantic partnership or dating, financial partnership unrelated to official job duties, or any such other relationship as defined by the “*Relative*” section below.

A **Relative** is defined as any known relationship formed by blood, marriage, or adoption, such as an individual’s:

- spouse, ex-spouse, domestic partner, ex-domestic partner;
- child (including stepchild, adopted child, child of domestic partner, foster child);
- parent, stepparent, adoptive parent, legal guardian, foster parent;
- sibling (including stepsibling, adoptive sibling, half-sibling);
- grandparent, grandchild, step or adoptive grandparent, step or adopted grandchild;
- father-in-law, mother-in-law, brother-in-law, sister-in-law, son-in-law, daughter-in-law, and similar relationships from a previous marriage or domestic partnership; and
- aunt, uncle, spouse of aunt or uncle, cousin, niece, nephew.

GUIDELINES

Compliance Procedures

Employees shall not participate in or influence any workplace decisions involving a relative and/or someone with whom they have a personal relationship, as defined in this policy. Areas involving workplace decisions include, but are not limited to, examinations, hiring, performance evaluations, transfers, reinstatements, promotions, demotions, scheduling, compensation, reclassification studies, investigations, and discipline.

Employees who are relatives and/or have personal relationships shall not be assigned to positions of interrelated trust or authority that could impair the County’s system of checks and balances. This includes, but is not limited to, positions in certain work units that deal with approval and disbursement of funds or negotiable instruments, development and awarding of contracts, and maintenance and control of financial systems.

Employees shall not directly supervise nor serve as intradepartmental or interdepartmental project leads to any relative and/or someone with whom they have a personal relationship.

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As a best practice, indirect supervision of a relative and/or someone with whom they have a personal relationship should be avoided. In cases where indirect supervision occurs or may occur between relatives and/or individuals involved in personal relationships, departments must assess whether the indirect supervision would result in potential nepotism or a conflict of interest and take action as necessary, based on the needs of the department, in accordance with this policy.

Departments may develop more stringent policy requirements, as appropriate. Should a department develop more stringent policy requirements, consultation with County Counsel, CEO-Employee Relations, and DHR may be needed.

Transfers, Reassignments, and External Agencies

If it is determined that employees who are relatives and/or are involved in a personal relationship hold positions that present a conflict of interest or are otherwise prohibited by this policy, the department head or designee may transfer or reassign one of the individuals to the same or comparable item in a different unit, bureau, or division in the department, or reassign one of the individuals to a different project, in alignment with relevant authorities, such as Civil Service Rules, MOUs, and departmental practices.

If a conflict of interest, as outlined in this policy, involves a non-County staff member (e.g., contract staff), the supervisor/manager may request that the appropriate agency not send that individual to work in a particular facility/division/section or on a specific assignment.

Exceptions

Requests for exception to this policy must be submitted by the employee in writing to their department head or designee for each working relationship covered by this policy. Any approvals granted by such department head or designee must also be in writing and include an explanation of why the working relationship is not a conflict of interest, impairs the employee’s ability to exercise fairness in the course of their duties, or negatively impacts departmental operations.

Departmental approvals must also include a written mitigation plan that, at a minimum:

- (1) Notes how the department will prevent actual and perceived conflicts of interest in the working relationship;
- (2) Describes the approved reporting relationships, including any modified reporting relationships needed to ensure that individuals with personal relationships as defined by this policy are removed from employment decisions or positions of oversight with one another; and

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- (3) Establishes or confirms the existence of appropriate oversight and approval processes for expenditures, reimbursement claims, overtime approval, or other financial decisions by the involved parties to reduce any appearance of favoritism or impropriety.

Required Acknowledgment and Disclosure

Upon hire and annually thereafter, all employees must acknowledge they have received and reviewed the County’s Nepotism and Personal Relationships policy.

It is the responsibility of the employee to notify their DHRM or designee in writing once they become aware of a current or pending assignment or reporting relationship that presents a potential conflict of interest, or when the personal or professional relationship with another employee changes and is now covered in this policy.

Personal information obtained through an employee’s disclosure under this policy is considered confidential and is only to be shared with individuals who have a legitimate need to know such information. Any approvals for exceptions to this policy shall be retained in the employee’s official personnel file.

Noncompliance

Failure to adhere to the County’s *Nepotism and Personal Relationships* policy may be cause for administrative action by the appointing authority, which may include discipline up to and including discharge from County service.

ATTACHMENT

- PPG 818 – Nepotism and Personal Relationships: Frequently Asked Questions

REFERENCES

- [Civil Service Rule 7.25, Examination to be impartial](#)
- [Civil Service Rule 15, Assignment, Interdepartmental Transfer, and Change of Classification](#)
- [Fiscal Manual, Chapter III, 3.1.4, Separation of Duties Controls](#)
- [Los Angeles County Code 2.210.010, Domestic partnership registry; purpose](#)
- CAO December 13, 1990 memo to all Department and District Heads titled “Nepotism Policy”

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DATE ISSUED/REVIEW DATE

Original Issue Date: **October 31, 2023**



PPG 818 – NEPOTISM AND PERSONAL RELATIONSHIPS

Frequently Asked Questions (FAQ's)

1. Under PPG 818, what kind of relationship must County employees disclose to their Departmental Human Resources Manager and/or designee?

Employees must disclose if they are aware of any current or pending working relationships (inclusive of County employees, Commissioners, external contractors, and volunteers) that would be in violation of this policy. In general, employees must report working assignments that place them in supervisor-subordinate, direct or indirect oversight, or auditing or approval roles with a relative or someone with whom they have a personal relationship.

It is the responsibility of the employee to notify their Departmental Human Resources Manager (DHRM) or designee in writing once they become aware of an assignment or reporting relationship that presents a conflict of interest, or when the personal or professional relationship with another employee changes and is now covered under this policy.

2. Are there any employment decisions involving a relative or personal relationship that employees should not participate in or influence?

Employees who have a personal relationship with a candidate or current staff member should not participate in employment decisions including, but not limited to, examinations, hiring, evaluations, transfers, reinstatements, promotions, and demotions. In addition, employees should not participate in investigations and/or disciplinary actions involving individuals with whom they have a personal relationship.

3. What are the restrictions to supervisory relationships among relatives or employees involved in personal relationships within the same chain of command?

Employees shall not directly supervise nor serve as intradepartmental or interdepartmental project leads to any relative or anyone with whom they have a personal relationship. Indirect supervision of a relative and/or anyone with whom they are involved in a personal relationship should also be avoided but can be assessed on a situational basis.

4. Are there any other restrictions regarding employment relationships among relatives and individuals involved in personal relationships?

Employees who are relatives and/or have personal relationships must not be assigned to positions of interrelated trust or authority which could impair the County's system of checks and balances. These include, but are not limited to, positions in certain work units that deal with approval and disbursement of monies or negotiable instruments, development and awarding of contracts, and maintenance and control of financial systems.

5. Can departments develop more stringent nepotism and personal relationship policy requirements?

Yes, departments may develop their own policy with more stringent policy requirements as long as the policy is in adherence to the minimum standards established by the County's *Nepotism and Personal Relationships* policy.

6. Do employees need to share past personal relationships with coworkers in the same department?

No. Employees are only required to disclose current personal relationships, with the exception of relationships from a previous marriage or domestic partnership, as outlined in the policy.

7. Are temporary department-designated living arrangements, such as firehouse rotations or assigned travel lodging, considered 'cohabitation'?

No, living arrangements established by the department for specific work assignments or temporary travel lodging are not considered cohabitation under this policy and do not need to be disclosed.

8. What actions can a department take if employees who are relatives and/or are involved in a personal relationship hold positions that present a conflict of interest?

If a situation arises (e.g., as a result of a new hire, rehire, transfer, promotion, reassignment, or reorganization) where employees are assigned to positions deemed inappropriate under this policy, the department head or their designee may transfer or reassign one of the individuals to the same or comparable item within the department, as permitted by relevant, existing authorities, such as Civil Service Rule 15 - *Assignment, Interdepartmental Transfer, and Change of Classification* and applicable MOUs.

Employees involved in an intradepartmental or interdepartmental project with a relative or other personal relationship may be reassigned to a different project.

9. Can exceptions to the policy be made?

Yes, exceptions to the policy must be requested and approved, in writing, by the department head or their designee. Approvals of such exemptions, as well as the department's plan to mitigate any conflicts of interest, should be filed in the employee's official personnel file.

10. When should the County's *Nepotism and Personal Relationships* policy be reviewed with employees?

The policy is to be provided to all employees when they are first hired and must be reviewed and acknowledged on an annual basis.

11. What happens when employees fail to comply with the County's *Nepotism and Personal Relationships* policy?

Failure to comply with the County's *Nepotism and Personal Relationships* policy may be cause for administrative action, which may include discipline up to and including discharge from County service.